United States Securities and

Exchange Commission

Plaintiff,

Defendant.

- against -

 $10 c_{\rm V} 1888$ (RMB)

MOTION TO ADMIT COUNSEL

Richard Verdiramo, Vincent L.

Verdiramo, Edward Meyer, Jr., &

Victoria Chen

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Jeffrey Lichtman

a member in good standing of

Page 1 of 6

the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Gregory Bartko

Firm Name:

Law Office of Gregory Bartko, LLC

Address:

3475 Lenox Road, Suite 400

City/State/Zip:

Atlanta, Georgia 30326

Phone Number:

(404) 238-0550

Fax Number:

(866) 342-4092

Gregory Bartko

is a member in good standing of the Bar of the States of

Georgia, North Carolina, and Michigan

There are no pending disciplinary proceeding against Gregory Bartko in any State or Federal court.

Dated: 05/24/2010

City, State: Atlanta, Georgia

Respectfully submitted,

Sponsor's

SDNY Bar 2395044

Firm Name: Law Office of Jeffrey Lichtman Address: 750 Lexington Avenue, 15th floor City/State/Zip: New York, New York 10022

Phone Number: 212.581.1001 Fax Number: 212.581.4999

STATE_BAR OF GEORGIA



Lawyers Serving the Public and the Justice System

Mr. Gregory Bartko Law Office of Gregory Bartko, P.C. 3475 Lenox Road, Suite 400 Atlanta, GA 30326

CURRENT STATUS:

Active Member-Good Standing

JOIN DATE:

06/08/1995

BAR NUMBER:

040476

TODAY'S DATE:

05/19/2010

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #

Supreme Court Docket #

Disposition

Date

N/A

N/A

N/A

N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to Superior Court of Georgia, the highest court required to practice law in Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



STATE BAR OF GEORGIA

Brandy Cleghon Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100 Atlanta, Georgia 30303 $(404) 527-8700 \blacksquare (800) 334-6865$ FAX (404) 527-8717 www.gabar.org

South Georgia

244 E. Second Street (Zip 31794) P.O. Box 1390 Tifton, Georgia 31793-1390 (229) 387-0446 **(800)** 330-0446 FAX (229) 382-7435

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United States Securitie Commission	es and Exchange Plaintiff,	10-civ-1888 (RMB)	The state of the s	
- against	_		The contract of	
B				

Richard Verdiramo, Vincent L. Verdiramo, Edward Meyer, Jr., & Victoria Chen
Defendant.

AFFIDAVIT OF JEFFREY LICHTMAN IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

State of New York)	
)	SS:
County of New York)	

UNITED STATES DISTRICT

Jeffrey Lichtman, being duly sworn, hereby deposes and says as follows:

- 1. I am of counsel at the Law offices of Jeffrey Lichtman. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Gregory Bartko, Esq. as counsel pro hac vice to represent Defendant, Victoria Chen, in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Gregory Bartko since we became associated in representing the same client in a matter that involves a civil enforcement action brought against the client by the U.S. Securities and Exchange Commission, approximately 90 days ago. I have been engaged to represent the same client in any parallel criminal proceedings that may arise.
- 4. Mr. Bartko is the managing-member of the Law Office of Gregory Bartko, LLC, in Atlanta, Georgia, which is a duly-formed Georgia limited liability company.
- 5. I have found Mr. Bartko to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission Gregory Bartko, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Gregory Bartko, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Gregory Bartko, pro hac vice, to represent Defendant, Victoria Chen, in the above captioned matter, be granted.

Dated: May 24, 2010.

City, State: New York, New York.

Respectfully submitted,

Name of Movant: Jefferey Lichtman, Esq.

SDNY Bar Code: 2395044

Sworn to and subscribed before me this 2^T day of May, 2010.

Notary Public:

My commission expires:

11/5/12

JEFFREY B. EINHORN
NOTARY PUBLIC-STATE OF NEW YORK
No. 02EI6195848
Qualified in Kings County
My Commission Expires November 03, 2012

United States District Court Southern District of New York

Plaintiff.

United States Securities and Exchange Commission

10 cv 1888

(RMB)

- against -Richard Verdiramo, Vincent L. Verdiramo, Defendant. Edward Meyer, Jr., and Victoria Chen

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Jeffrey Lichtman attorney for (not representing parties in this action) and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Gregory Bartko, Esq.

Firm Name:

Law Office of Gregory Bartko, LLC

Address:

3475 Lenox Road, Suite 400

City/State/Zip:

Atlanta, Georgia 30326

Telephone/Fax:

(404) 238-0550

Email Address:

(866) 342 4092

is admitted to practice pro hac vice as counsel for (not representing parties in this action) in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State: New York, New York.

United States District/Magistrate Judge

FOR OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT#

CERTIFICATE OF SERVICE Case 1:10-cv-01888-RMB Document 15 Filed 05/25/2010 Page 6 of 6

1, IAN COPPE, DESCARE UNDER PENALTY OF PERTURY:

- 1. IAM OVER 18 years of age;
- 2. 1 AM NOT A PARTY TO THIS ACTION.
 (10-W-1888)(KMB)
- 3, THAT I MAILED A COPY OF THE ENCIOSED MOTION TO ADMIT COUNSEL FRO HAR VICE BY REGULAR MAIL TO:

UNITED STATES ATTORNEY'S OFFICE SOUTHERN DISTRICT OF NEW YORK ONE ST. ANDREW'S PLAZA NEW YORK, NEW YORK 10007

DATE: MAY 25,2010 NEW YORK, NY

IANKOFFE